

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

V.

ROBERT J. SAMPSON,

Defendant.

CRIMINAL NO. 04-40010-NMG

**GOVERNMENT’S SUPPLEMENTAL SUBMISSION
TO SENTENCING MEMORANDUM**

In connection with his request for a downward departure, defendant Robert J. Sampson (“Sampson”) disclosed to the United States that one of the two clients he assisted financially was Sharon Gervais (“Gervais”). In the United States’ Sentencing Memorandum and Opposition to the Motion for Downward Departure (“Opposition”), the United States stated that it had not been able to locate Gervais. Subsequent to filing the Opposition, the United States did locate an obituary for a Sharon Gervais from the Worcester Telegram dated July 15, 2001. That obituary is attached at Tab A.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Jack W. Pirozzolo
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Dated: January 10, 2005

CERTIFICATE OF SERVICE

This is to certify that on January 10, 2005, I served the foregoing document, via electronic means and U.S. Mail, upon James Gribouski, Esq., counsel for the defendant, and, by hand, upon Michelle Roberts of the U.S. Probation Office.

/s/ Jack W. Pirozzolo
JACK W. PIROZZOLO
Assistant U.S. Attorney